

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

v.

RICHARD BUSH and  
MAYANK MISHRA

DEFENDANTS.

Case No. 2:12-cr-00092-CB

Order of Contempt against  
Attorney Daphne Silverman  
re: Criminal Action no. 12-92

HONORABLE JUDGE  
CATHY BISSOON

Type of Pleading:

**MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSE TO GOV'T.  
MOTION FOR ORDER TO SHOW  
CAUSE**

Filed on Behalf of:

Respondent Attorney Daphne Silverman

Counsel of Record for Respondent:

JOSEPH VICTOR CHARLTON, ESQ.  
Pa. Supreme Court Id. No.: 200429

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THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	:	Case No. 2:12-cr-00092-CB
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v.	:	
	:	Order of Contempt against
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MAYANK MISHRA	:	
	:	
DEFENDANTS.	:	HONORABLE JUDGE
	:	CATHY BISSOON

**MOTION FOR EXTENSION OF TIME TO**  
**FILE RESPONSE TO GOVERNMENT MOTION**  
**FOR ORDER TO SHOW CAUSE**

AND NOW, comes Respondent Attorney Daphne Silverman, by and through her attorneys, Joseph V. Charlton, Esquire and CHARLTON & CHARLTON who file on her behalf this Motion For Extension of Time To File Respondent's Response to the Government's Motion for Order to Show Cause and in support thereof state:

1. On February 9, 2016 the Court issued an Order<sup>1</sup> finding Respondents Daphne Silverman and Respondent Norman Silverman in contempt of court<sup>2</sup> for conduct during the trial of the above matter. Respondent Daphne Silverman was fined \$1,000.00 and Respondent Norman Silverman was fined \$4300.00

2. On or about March 15, 2016 the Government filed a Motion For Order To Show Cause why the Court should not find Respondents in contempt of the Court's Order of February 9, 2016.<sup>3</sup>

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<sup>1</sup> Docketed as Document 342.

<sup>2</sup> Pursuant to 18 U.S.C. § 401.

<sup>3</sup> Docketed as Document 364.

3. On or about March 16, 2016, Respondent Norman Silverman filed a Motion For Extension of Time to a Response/Reply to the Government Motion For Order To Show Cause.<sup>4</sup>

4. The Court granted Respondents Extension Motion and set the date for Respondent's Response/Reply for April 25, 2106.<sup>5</sup>

5. Respondent Daphne Silverman contacted undersigned counsel to represent her in the contempt proceedings earlier this week and counsel filed his Appearance earlier today.

6. In order to review necessary transcripts and conduct research on the issues presented, counsel respectfully requests that he be granted an extension of 14 days from April 25, 2016 to file a Response/Reply on behalf of Respondent Daphne Silverman.

7. Counsel's staff has telephonically contacted AUSA Brendan Conway regarding an extension and AUSA Conway consents to an extension of 7 days, however, he objects to a 14 day extension.

8. This extension is requested solely for the purpose of allowing counsel to consult with his client, conduct necessary research and prepare a Response/Reply consistent with effective representation of this Respondent.

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<sup>4</sup> Docketed at Document 367.

<sup>5</sup> Docketed at Document 369.

WHEREFORE, counsel for Respondent respectfully requests that the Court grant an extension of 14 days from April 25, 2016 for the reasons stated.

Respectfully submitted,

*/s/ Joseph V. Charlton*

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